

THE HONORABLE RICHARD A. JONES

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

ABDIQAFAR WAGAFE, *et al.*, on behalf
of themselves and others similarly situated,

Plaintiffs,

v.

JOSEPH R. BIDEN, President of the
United States, *et al.*,

Defendants.

No. 2:17-cv-00094-RAJ

**STIPULATION FOR ORDER THAT
THE CLERK UNSEAL DOCKET 550
AND ORDER THEREON**

WHEREAS Plaintiffs filed the Declaration of Liga Chia and its Supporting Exhibit A (Dkt. 550) under seal; and

WHEREAS Defendants have no objection to the Declaration of Liga Chia and its supporting Exhibit A (Dkt. 550) being publicly filed in its entirety,

NOW THEREFORE the parties do hereby stipulate and agree that the Court may make and enter the following order:

1. The Clerk of Court shall unseal Docket 550.

SO STIPULATED.

DATED: July 21, 2021

s/ Jennifer Pasquarella
s/ Liga Chia
 Jennifer Pasquarella (admitted pro hac vice)
 Liga Chia (admitted pro hac vice)
ACLU Foundation of Southern California
 1313 W. 8th Street
 Los Angeles, CA 90017
 Telephone: (213) 977-5236
 jpasquarella@aclusocal.org
 lchia@aclusocal.org

s/ Matt Adams
 Matt Adams #28287
Northwest Immigrant Rights Project
 615 Second Avenue, Suite 400
 Seattle, WA 98122
 Telephone: (206) 957-8611
 matt@nwirp.org

s/ Stacy Tolchin
 Stacy Tolchin (admitted pro hac vice)
Law Offices of Stacy Tolchin
 634 S. Spring Street, Suite 500A
 Los Angeles, CA 90014
 Telephone: (213) 622-7450
 Stacy@tolchinimmigration.com

s/ Hugh Handeyside
s/ Lee Gelernt
s/ Hina Shamsi
s/ Charles Hogle
 Hugh Handeyside #39792
 Lee Gelernt (admitted pro hac vice)
 Hina Shamsi (admitted pro hac vice)
 Charles Hogle (admitted pro hac vice)
American Civil Liberties Union Foundation
 125 Broad Street
 New York, NY 10004
 Telephone: (212) 549-2616
 hhandeyside@aclu.org
 lgelernt@aclu.org
 hshamsi@aclu.org
 chogle@aclu.org

s/ Harry H. Schneider, Jr.
s/ Nicholas P. Gellert
s/ David A. Perez
s/ Heath L. Hyatt
s/ Paige L. Whidbee
 Harry H. Schneider, Jr. #9404
 Nicholas P. Gellert #18041
 David A. Perez #43959
 Heath L. Hyatt #54141
 Paige L. Whidbee #55072
Perkins Coie LLP
 1201 Third Avenue, Suite 4900
 Seattle, WA 98101-3099
 Telephone: (206) 359-8000
 HSchneider@perkinscoie.com
 Ngellert@perkinscoie.com
 Dperez@perkinscoie.com
 Hhyatt@perkinscoie.com
 Pwhidbee@perkinscoie.com

s/ John Midgley
 John Midgley #6511
ACLU of Washington
 P.O. Box 2728
 Seattle, WA 98111
 Telephone: (206) 624-2184
 jmidgley@aclu-wa.org

s/ Sameer Ahmed
s/ Sabrineh Ardalan
 Sameer Ahmed (admitted pro hac vice)
 Sabrineh Ardalan (admitted pro hac vice)
Harvard Immigration and Refugee Clinical Program
 Harvard Law School
 6 Everett Street, Suite 3105
 Cambridge, MA 02138
 Telephone: (617) 495-0638
 sahmed@law.harvard.edu
 sardalan@law.harvard.edu

Counsel for Plaintiffs

STIPULATION FOR ORDER
 UNSEALING DKT. 550 AND ORDER THEREON
 (NO. 2:17-CV-00094-RAJ) – 2

Perkins Coie LLP
 1201 Third Avenue, Suite 4900
 Seattle, WA 98101-3099
 Phone: 206.359.8000
 Fax: 206.359.9000

SO STIPULATED.

DATED: July 21, 2021

BRIAN M. BOYNTON
Acting Assistant Attorney General
Civil Division
U.S. Department of Justice

JESSE L. BUSEN
Counsel for National Security
National Security Unit
Office of Immigration Litigation

AUGUST FLENTJE
Special Counsel
Civil Division
Office of Immigration Litigation

W. MANNING EVANS
Senior Litigation Counsel
Office of Immigration Litigation

ETHAN B. KANTER
Chief, National Security Unit
Office of Immigration Litigation

BRENDAN T. MOORE
Trial Attorney
Office of Immigration Litigation

TESSA GORMAN
Acting United States Attorney

LEON B. TARANTO
Trial Attorney
Torts Branch
Civil Division

BRIAN C. KIPNIS
Assistant United States Attorney
Western District of Washington

VICTORIA M. BRAGA
Trial Attorney
Office of Immigration Litigation

LINDSAY M. MURPHY
Senior Counsel for National Security
National Security Unit
Office of Immigration Litigation

Counsel for Defendants

ANNE DONOHUE
Counsel for National Security
National Security Unit
Office of Immigration Litigation

STIPULATION FOR ORDER
UNSEALING DKT. 550 AND ORDER THEREON
(NO. 2:17-CV-00094-RAJ) – 3

Perkins Coie LLP
1201 Third Avenue, Suite 4900
Seattle, WA 98101-3099
Phone: 206.359.8000
Fax: 206.359.9000

ORDER

IT IS SO ORDERED.

DATED: , 2021.

RICHARD A. JONES
United States District Judge